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December 31, 2018

**VIA EMAIL**

Jocelyn G. Boyd, Esquire  
Chief Clerk & Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Dockets No. 2017-207-E, 2017-305-E, and 2017-370-E.

Dear Ms. Boyd:

I submit this letter as intervenor in the above consolidated proceedings. By copy of this letter, I am serving the same on the parties of record.

I join my request for rehearing or reconsideration of Order 2018-804 with petitions presented by ORS and other intervenors. I write principally to support the arguments presented in the ORS petition requesting rehearing or reconsideration. There are several points on which I would like to provide additional comments.

As a ratepayer, I am unhappy that we will continue to pay such significant portions of the V. C. Summer costs and in particular, that we will repay those costs with what appears to be an unnecessarily inflated ROE. However, my greatest concerns at this point are related to other merger conditions.

I am deeply concerned that the Commission failed to find that SCE&G management of the project was imprudent from the time of their filing of March 12, 2015, and thereafter. SCE&G did not just fail to disclose the contents of the Bechtel report and important findings of their internal staff that were in conflict with their regulatory filings. Despite inquiries from ORS, SCE&G intentionally prevented ORS and the Commission from knowing that these existed. Their claim that they chose instead to trust Westinghouse is in conflict with abundant evidence that they did not, in fact, trust Westinghouse. In any case, these divergent opinions from such experienced experts as the Bechtel team should have been provided to ORS and

the Commission for their consideration. The evidence presented to the Commission is more than sufficient to establish that V. C. Summer project management was imprudent, as found by Commissioner Ervin in his Concurrence statement on “Specific Findings of SCE&G’s Imprudence.”

As ORS observes, the Commission is obligated to adjudicate the issues raised in the Joint Application and failed to do so when it evaded a clear resolution of this issue. Further, the suggestion by commissioners that a finding of imprudence was avoided out of concerns related to potential future criminal proceedings was extremely disturbing. Protecting utilities in proceedings outside the regulatory framework is not a legitimate concern of the Commission and must not affect your ruling.

I am also very concerned that the Commission chose not to adopt merger provisions to protect ratepayers with respect to affiliate transactions including those that could arise from construction of the Atlantic Coast Pipeline in South Carolina. As noted by Commissioner Ervin in his Concurrence and by the ORS in its petition for rehearing, the ORS, the South Carolina Coastal Conservation League, the Southern Alliance for Clean Energy and Speaker of the House of Representatives James H. Lucas all asked that the Commission provide protective conditions. In particular, it is noteworthy that although Speaker Lucas supported the merger itself and the Dominion offer, he agreed with other intervenors that further protections are needed to ensure that South Carolina does not face yet another energy-related crisis in a few years through yet another troubled and excessively costly project. The Commission should act to correct this very dangerous omission.

In addition, I support the concerns raised in the petition for rehearing filed on behalf of Friends of the Earth and Sierra Club with respect to the need for protections for low income ratepayers, as well as conditions related to alternative energy and energy efficiency. These are all areas in which the Joint Applicants do not have stellar records.

The Commission exists to protect the public from high costs and poor performance because monopolies do not allow us to protect ourselves by shopping for better prices and services. We have had ample evidence in these proceedings that utilities (specifically including SCE&G) are willing to burden customers with excessive cost and inferior performance to the extent that the law and regulators permit. I therefore request that the Commission reconsider Order 2018-804. Address these areas of grave concern to me as a ratepayer, and to all others potentially affected by the merger.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lynn S. Teague". The signature is fluid and cursive, with a long horizontal line extending from the end.

Lynn S. Teague

cc: All Parties